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AMERICAN FARM BUREAU FEDERATION®

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April 7, 2004

Docket Number 03-080-1
Regulatory Analysis and Development
PPD, AHPIS, Station 3C71
4700 River Road Unit 118
Riverdale, Maryland 20737-1238

Dear Sir or Madam:

The American Farm Bureau Federation appreciates the opportunity to submit comments regarding the designation of Canada as a country that presents minimal risk of introducing Bovine Spongiform Encephalopathy (BSE) into the United States. Farm Bureau supports the concept of designating certain countries as minimal risk providing they can satisfy certain measurable criteria as established by the USDA in this regulation and the Office of International Epizootics (OIE.)

In 1997, USDA increased the number of countries and products under import restrictions due to BSE. This was a sound action in response to findings that BSE was the most likely cause of variant Creutzfeldt-Jakob disease (vCJD) and that the cattle populations in more countries of Europe were exposed to the agent than previously thought. However, it is appropriate to reconsider that regulation due to a significant improvement in science that allows the definition of products that pose a risk with far more accuracy. In addition, there are several diagnostic tests that allow a more accurate picture of the prevalence of BSE in each country.

A segment of the cattle population in North America has been exposed to the BSE agent. USDA should not completely open our borders allowing undue exposure to the American public and the U.S. cattle herd. USDA must continue to monitor the changing science and world situation in regards to BSE to prevent additional risks. With increased diagnostic sensitivity and increased testing for BSE, it is likely that additional tissues may be found to harbor infectivity.

Farm Bureau agrees with USDA's assessment of Canada as a minimal risk country and supports allowing additional products and certain live animals into the United States. We are concerned, however, that Canada has not yet established a surveillance program to ascertain the level of disease in the country and especially certain regions in the country. Canada's goal of testing 8,000 animals falls considerably short of the U.S. plan to test at least half of its at risk population. Farm Bureau encourages USDA to urge Canada to increase its surveillance to 30,000 samples immediately.

USDA states, "Canadian Government authorities inspect rendering facilities, feed manufacturers, and feed retailers to ensure compliance with the feed ban. Rendering facilities are regulated under an annual permit system, and compliance with the regulations is verified through at least one inspection each year. Feed manufacturers or mills, feed retailers, and farms have been inspected on a routine basis. These inspections have shown a high level of compliance. As noted above, Canada has maintained an effective ban on feeding mammalian protein to ruminants, with requirements similar to the feed ban in place in the United States, since 1997."

USDA did not provide any statistical information regarding actual compliance with the feed ban or the frequency of inspections. Feed is the primary, if not sole, source of BSE transmission.

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Therefore, we urge caution when evaluating these criteria for any country in regard to minimal risk. Historically, most countries have had difficulty in ascertaining compliance on the farm. Experience in Europe has shown that noncompliance on farms and cross contamination may be an important factor in extending the time that the BSE remains circulating in a cattle population. This is especially true for countries that do not have dedicated slaughter lines and still allow ruminant Specified Risk Materials (SRMs) in feed for animals other than ruminants.

Canada must increase surveillance as soon as possible to establish prevalence of the disease especially in regions where exposure is known to have occurred. Ascertainment of the level of disease in the country will enable the United States to make better informed risk based decisions.


Farm Bureau urges USDA to specify a timeframe in regards to an effective feed ban. This regulation will apply to countries other than Canada. Usually a feed ban takes at least a year to be established and to educate those involved in the process. Although an exact incubation time for BSE has not been established, a three to six year range is well documented. Epidemiological and other evidence indicates that bovines are usually infected within the first year of life. Many cattle with BSE display clinical evidence of the disease at five to six years old. Hence an effective feed ban in place for five to six years may still fall short of protecting an importing country.

The regulation proposes the following four categories of BSE classification for countries: BSE free, BSE known to exist, BSE minimal risk and BSE undue risk. Farm Bureau agrees that these categories enable countries to be categorized appropriately. However, historically USDA has waited for something to prompt classification of a country. There are a number of countries in the world that have not been classified into any of the categories and technically can still trade high-risk materials such as meat and bone meal with the U.S. While this trade may not be occurring at this time, there is always changing trade patterns. We urge USDA to adopt the same approach it takes with Foot and Mouth Disease (which is also the same approach that Canada takes with BSE) -- until a country can establish trade for any ruminant products that may pose a risk or any live ruminants, it must be classified into one of the four established categories.

The experience with both cases of BSE in North America illustrates the need for an identification and traceability system in the United States. We urge USDA to implement and adequately fund such a system quickly. This regulation should establish that official identification on imported animals may not be removed. If the identification is lost, a replacement should be required and records kept indicating such a transaction. It is essential to allow for the traceability of imported animals in response to any disease in the exporting country.

Farm Bureau appreciates the opportunity to comment on this regulation.

Sincerely,



Bob Stallman
President